

EXHIBIT 1

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1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION
4

5)
6) Civil Action No.
7) 5:16-cv-10444-JEL-MKM
8 In re: FLINT WATER CASES) (consolidated)
9)
10) Hon. Judith E. Levy
11) Mag. Mona K. Majzoub
12)
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HIGHLY CONFIDENTIAL
Wednesday, August 19, 2020
VOLUME I

Remote videotaped deposition of
JEFFREY R. HANSEN, conducted at the location of the
witness in East Lansing, Michigan, commencing at
9:04 a.m., on the above date, before Carol A. Kirk,
Registered Merit Reporter, Certified Shorthand
Reporter, and Notary Public.

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1 MR. ERICKSON: Object to form and
2 foundation.

3 A. That's right.

4 Q. So if there was something that was
5 going to be needed in order to use the Flint
6 River water safely, it was LAN's job to identify
7 what that was and figure out how much it would
8 cost; is that right?

9 MR. ERICKSON: Object to form and
10 foundation.

11 A. Again, Warren Green developed this
12 product, but that was my understanding.

13 Q. Okay. What was your role in
14 working on this exhibit that was provided to the
15 City of Flint in 2011?

16 A. My role was minor. For this
17 document in front of me, it was primarily just
18 an editorial review, checking for grammar and
19 punctuation and clarity of wording, that kind of
20 thing.

21 Q. Sure. And in reviewing and
22 editing for clarity of wording, you had in mind
23 sort of what was the project and how LAN was
24 going about providing what the city was looking

Highly Confidential - Jeffrey R. Hansen

1 MR. ERICKSON: Object to form and
2 foundation.

3 A. No.

4 I said no.

5 Q. Thank you.

6 - - -

7 (Hansen Deposition Exhibit 5 marked.)

8 - - -

9 BY MR. CONNORS:

10 Q. Okay. Now appearing on your
11 screen is Exhibit 5 to the Hansen deposition.
12 These are some apparent meeting notes. They
13 were previously marked as Exhibit 46 to the
14 Warren Green deposition.

15 Do you recognize this document,
16 which is -- will be marked as Exhibit 5?

17 A. Yes.

18 Q. What is it?

19 A. Those are meeting notes from a
20 meeting.

21 Q. Who wrote these meeting notes?

22 A. I did.

23 Q. And there's a date at the top,
24 May 22, 2013. Was that around the beginning of

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1 your work for the City of Flint in 2013, or did
2 you do work before this meeting?

3 A. No. That was the beginning.

4 Q. Okay. So Hansen Exhibit 5 is sort
5 of the first written work product you have
6 describing what it was you're working on for the
7 City of Flint in 2013; is that right?

8 A. I believe so.

9 Q. Okay. And where was this meeting
10 that these notes reflect?

11 A. I believe this meeting took place
12 at the Flint Water Treatment Plant.

13 Q. Who was there?

14 A. Warren Green, myself, Brent
15 Wright, and I believe Duffy Johnson was there.
16 If you had my original handwritten notes, I
17 think it may have the initials of people who
18 attended at the top.

19 Q. What was the purpose of this
20 meeting that you had at the Flint Water
21 Treatment Plant on May 22, 2013?

22 MR. ERICKSON: Objection;
23 foundation.

24 A. It was my understanding that it

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1 Q. Okay. And in the "Scope of
2 Services" section that you had asked about and
3 that we looked at in this contract, the contract
4 references the -- "complete the project in
5 accordance with the proposal submitting on
6 June 2013."

7 Do you see that?

8 A. Yes.

9 Q. And so the scope of services
10 provision in the contract is referencing LAN's
11 proposal to the city from June 2013, correct?

12 A. Yes.

13 MR. ERICKSON: Objection to form
14 and to the extent it calls for a
15 conclusion of law.

16 Q. Okay. And if I scroll down, then,
17 in Exhibit 6, there is, following the contract,
18 a letter dated June 10, 2013 to Mr. Brent
19 Wright, and this letter is LAN's proposal to the
20 City of Flint; is that right?

21 A. It appears so.

22 Q. Okay. Did you work on this
23 proposal before it was sent to Flint?

24 A. I don't remember specifically. If

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1 I had, it would have been very minimal.

2 Q. Did you review LAN's proposal
3 before beginning work or during beginning the
4 work for the City of Flint?

5 A. As I mentioned, I glanced through
6 it.

7 Q. Okay. Now, you've testified that
8 you understood that LAN was supposed to perform
9 work on a discrete set of improvements for the
10 water treatment plant; is that true?

11 MR. ERICKSON: Object to the form.

12 A. That's correct.

13 Q. So who, if anyone, was responsible
14 for coming up with that list for figuring out,
15 okay, what are the improvements required to get
16 that water treatment plant up and running
17 safely?

18 MR. ERICKSON: Objection; asked
19 and answered.

20 A. I don't know all the information
21 Warren had in developing that original list in
22 the proposal, but I know that he did rely on
23 some previous studies that had been completed.

24 Q. Okay. So Mr. Green relied on some

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1 Warren Green, correct?

2 MR. ERICKSON: Objection;

3 foundation.

4 A. I'm not sure about the others,
5 what their full experience is. For myself, I
6 have some water treatment experience.

7 Q. Okay. But you don't consider
8 yourself a subject matter expert in water
9 treatment by any means, do you?

10 A. I do not.

11 Q. Okay. Moving down further in
12 LAN's proposal, there is a description of a set
13 of tasks beginning on Bates label LAN Flint
14 187668.

15 Do you see that? It talks about a
16 Task 1, Task 2, Task 3.

17 Do you see that?

18 A. Yes.

19 Q. Okay. And it's your understanding
20 that the executed contract with the city in July
21 2013 encompassed Task 1 and Task 2?

22 MR. ERICKSON: Objection to the
23 form and foundation and to the extent it
24 calls for a conclusion of law.

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1 decisions or recommendations regarding water
2 treatment or corrosion control?

3 A. He gave me specific tasks to work
4 on. I would do so.

5 Q. But you weren't qualified, for
6 example, to provide a peer review or a critique
7 of any decisions that Mr. Green made about water
8 quality or water treatment, correct, because
9 that's not your expertise?

10 MR. ERICKSON: Object to the form.

11 A. No. I would defer to Warren on
12 water quality issues.

13 Q. Okay. Okay. Following that
14 chart, there are some biographies of the project
15 team. I'm just going to scroll down to yours.

16 So there's the project team bio
17 beginning on page ending in 687. It says "Jeff
18 Hansen" on it. Is this the description of your
19 experience provided by the City of -- or by LAN
20 to the City of Flint in connection with LAN's
21 Flint proposal?

22 A. It looks so, yeah.

23 Q. Was this the kind of thing that
24 you would help prepare, or was this prepared by